

United States District Court  
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

TODD RICHARD CHAZEN

CRIMINAL COMPLAINT

Case Number:

10-mj-493 FLN

I, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 14, 2010, in Goodhue County, in the State and District of Minnesota, defendant knowingly possessed, in and affecting interstate commerce, a Taurus .45 caliber pistol, after having been convicted of crimes punishable by imprisonment for a term exceeding one year,

in violation of Title 18 , United States Code, Section(s) 922(g)(1) and 924(e).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

Date

11/18/10  
The Honorable Franklin L. Noel  
UNITED STATES MAGISTRATE JUDGE

Name &amp; Title of Judicial Officer

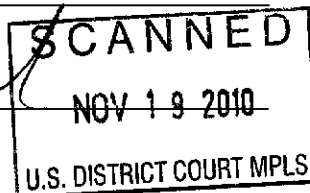
at

Minneapolis, MN

City and State

*Liane M. Sellner*  
Signature of Complainant  
Liane Sellner  
ATF

*Franklin L. Noel*  
Signature of Judicial Officer



STATE OF MINNESOTA )  
 ) ss. **AFFIDAVIT OF SA LIANE SELLNER**  
 COUNTY OF HENNEPIN )

1. I am a Special Agent of the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have been so employed since 2003. In this capacity, I am responsible for the enforcement of the laws of the United States of America, including laws relating to firearms, drug enforcement, and violent crimes. I have conducted numerous investigations relating to violations of Federal firearms laws. The investigations have resulted in the arrests of criminal defendants and the seizure of numerous firearms, firearms components, firearms records, and ammunition.

2. This Affidavit is submitted in support of a Complaint against Todd Chazen (hereinafter "Chazen") charging him with possession of a firearm by a convicted felon, in violation of 18 U.S.C. § 922(g)(1) and 924(e).

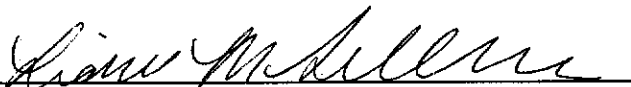
3. On August 14, 2010, a deputy in Goodhue County, Minnesota responded to a report of two suspicious vehicles outside the city of Cannon Falls. At the scene, the deputy encountered two people and identified them by their Minnesota Driver's Licenses as Sara Elizabeth Stoltz and Todd Richard Chazen. Chazen and Stoltz told the deputy that a third, unidentified party had been driving one of the vehicles when it ran out of fuel. Chazen reported that this person had left the area and had not returned. The abandoned vehicle did not register to either Chazen or Stoltz, and both were allowed to leave. During an inventory search of the abandoned vehicle prior to it being towed, the deputy found, among other items, a holster for a handgun, a light, which the deputy recognized as one specifically designed for attachment to a handgun, a document with Chazen's name on it, and a new pair of DC brand shoes. The deputy searched the roadside near the area and found a shoebox for DC brand shoes. Inside the shoebox, the deputy found a Taurus, model PT145, .45 caliber pistol, serial number NZC89534, ammunition, two pipes which the deputy recognized to be of the type typically used to smoke methamphetamine, and a baggie containing approximately 23.9 grams of what the deputy believed to be methamphetamine. A field test conducted by the deputy indicated that the substance was methamphetamine. The deputy also learned that the firearm had been reported stolen in 2008.

4. On November 3, 2010, investigators interviewed Sara Stoltz regarding the incident on August 14, 2010. Stoltz stated that Chazen had called her after the car he was driving ran out of fuel. Stoltz told investigators that Chazen had purchased the car a few months before the incident. Stoltz stated that, after she arrived to help Chazen, Chazen became nervous when another vehicle drove slowly by them. This prompted Chazen to remove a shoebox, which Stoltz believed was a DC brand shoebox, from the trunk of his car and put it along the roadside. Stoltz further stated that Chazen had showed her a black and silver handgun sometime in late July 2010. Stoltz informed investigators that she had known Chazen for approximately four or five years and, throughout that time, had known Chazen to manufacture and sell methamphetamine.

5. A review of Chazen's criminal history revealed numerous prior felony convictions, including the following: Assault in the Second Degree in or about September 1995, in Blue Earth County, Minnesota; Controlled Substance in the Second Degree in Rice County, Minnesota in or about December 2002, and Burglary in the Second Degree, in or about June 2003, in LeSueur County, Minnesota.

6. On November 17, 2010, Special Agent Liane Sellner reviewed a report from the Minnesota Bureau of Criminal Apprehension. The report stated that the DNA profile obtained from a sample taken from the firearm recovered in association with Chazen, matched the DNA profile from a sample obtained from Chazen.

7. On November 17, 2010, Special Agent Liane Sellner reviewed information about the firearm recovered in association with Chazen and determined that it was not manufactured in the State of Minnesota and previously traveled in interstate or foreign commerce.

  
Special Agent Liane Sellner  
Bureau of Alcohol, Tobacco, Firearms, & Explosives.

SUBSCRIBED and SWORN to Before Me

This 18<sup>th</sup> day of November, 2010

  
Franklin L. Noel  
United States Magistrate Judge